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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARC J. RANDAZZA, an individual;
JENNIFER RANDAZZA, an individual;
NATALIA RANDAZZA, a minor,

Case No. 2:12-CV-02040-JAD-BNW

Plaintiffs,

STATUS REPORT

vs.

CRYSTAL COX, an individual; and
ELIOT BERNSTEIN, an individual,

Defendant.

Plaintiffs Marc J. Randazza, Jennifer L. Randazza, and Natalia Randazza (“Plaintiffs”) file their status report pursuant to this Court’s Minute Order dated March 22, 2022 (ECF No. 314) relating to the status of bankruptcy proceedings. Specifically, that Order directed:

that the parties must file a status report to the court every 90 days, beginning April 1, 2022, to advise of the status of the bankruptcy proceedings. Based on the status of this case, the Clerk of the Court is directed to ADMINISTRATIVELY CLOSE this matter subject to reopening after the bankruptcy proceedings have concluded.

ECF No. 314. Pursuant to that Minute Order, Plaintiffs filed a Status Report on April 1, 2022 (ECF No. 315), and this Status Report is being filed as required 90 days thereafter.

As this Court is aware, Mr. Randazza filed a petition for relief under Chapter 11 of the United States Code on August 28, 2015, in the United States Bankruptcy Court for the District of Nevada, Case No. BK-S-15-14956-abl. *See* ECF No. 295. Defendant Cox’s counterclaims were referred to the bankruptcy court. *See* ECF No. 307.

Mr. Randazza filed an adversary complaint against Defendant Cox in the bankruptcy court objecting to Defendant Cox's proof of claim, seeking declaratory relief as to dischargeability, and bringing a claim against Defendant Cox for abuse of process. *See Marc John Randazza v. Crystal L. Cox*, Adv. No. 16-01111, at ECF No. 6 (Bankr. D. Nev., filed Oct. 6, 2016) (first amended complaint).¹ The Bankruptcy Court awarded default judgment in favor of Mr. Randazza and against Defendant Cox on December 6, 2017. *See* Adv. ECF No. 44. The Bankruptcy Court's judgment awarded Mr. Randazza compensatory damages in the amount of \$411,582.59 and punitive damages in the amount of \$41,158.00, for a total judgment in the amount of \$452,740.59. *Id.*

Mr. Randazza sought relief in the Bankruptcy Court against Defendant Cox in relation to the judgment under NRS 21.320, which allowed him to reach certain property and interests of Ms. Cox that cannot be seized by a writ of execution. *See* Adv. ECF No. 87. As part of this effort, Mr. Randazza sought to liquidate Defendant Cox's interests, if any, in the domains that are the subject of the preliminary injunction issued by this Court. *See id.*

To effectuate that motion, on March 22, 2022, the Bankruptcy Court entered an Order Granting Plaintiff's Amended *Ex-Parte* Motion to Reopen Case for Judgment Creditor to Obtain Order Pursuant to NRS 21.320. *See In Re: Marc J. Randazza*, No. BK-S-15-14956-abl, at ECF No. 346 (Bankr. D. Nev., filed Mar. 22, 2022). Two days later, on March 24, 2022, Mr. Randazza filed the motion for an order under NRS 21.320. *See* Adv. ECF No. 87. A hearing on that motion before the Bankruptcy Court was held on May 24, 2022. *See* Adv. ECF No. 88.

During that hearing, the Court granted Mr. Randazza's Motion, transferring the ownership interest in certain domains and other intangible property from Ms. Cox to Mr. Randazza in partial satisfaction of Mr. Randazza's judgment at a liquidated value. *See* Order Granting Plaintiff's Motion for Order Pursuant to NRS 21.320, Adv. ECF No. 94, attached as **Exhibit 1**. The

¹ References to the docket in the bankruptcy adversary proceeding are hereafter referred to as "Adv. ECF No."

1 Bankruptcy Court's Order included all of the domains and other assets which were subject to the
2 preliminary injunction in this matter. *See id.*

3 As of the time of this filing, the Bankruptcy Action remains pending. A hearing was held
4 in the Bankruptcy Action yesterday, June 29, 2022, on Mr. Randazza's Motion to Re-Close the
5 bankruptcy case, during which the Court orally granted the motion. A formal order closing the
6 case has been submitted to the Bankruptcy Court, but has not yet been entered, however.

7 Once the Bankruptcy Action is formally closed, Plaintiffs will promptly advise the Court
8 on how it wishes to proceed with this Action. Plaintiffs will notify the Court upon entry of such an
9 order and, if the Court is amenable, respectfully request 14 days from the date of the Bankruptcy
10 Court's Order to file an additional status report regarding their intentions.

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12 Dated: June 30, 2022.

Respectfully Submitted,

13 /s/ Ronald D. Green

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 30, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document being served via transmission of Notices of Electronic Filing generated by CM/ECF.

I further certify that a true and correct copy of the foregoing document is being served via electronic mail to:

<savvybroker@yahoo.com>
<crystal@crystalcox.com>
<ReverendCrystalCox@gmail.com>

Additionally, a true and correct copy of the foregoing document is being served to the persons at the addresses listed below via United States mail, postage fully prepaid:

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/s/ Ronald D. Green
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